

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**BMG RIGHTS MANAGEMENT** )  
**(US) LLC, and ROUND HILL** )  
**MUSIC LP** )

**Plaintiffs,** )

**v.** )

**Case No. 1:14-cv-1611(LO/JFA)**

**COX COMMUNICATIONS, INC. and )  
COXCOM, LLC )  
Defendants. )**

**DECLARATION OF STEPHANIE L. ROBERTS IN SUPPORT OF  
PLAINTIFFS' MOTIONS *IN LIMINE***

6. Attached hereto as **Roberts Exhibit 5** is a true and correct copy of excerpts from the transcript of Christopher Sabec's July 7, 2015 deposition.
7. Attached hereto as **Roberts Exhibit 6** is a true and correct copy of a document produced by Cox in this litigation as BR\_00000004-39.
8. Attached hereto as **Roberts Exhibit 7** is a true and correct copy of the October 30, 2015 Hearing transcript.
9. Attached hereto as **Roberts Exhibit 8** is a true and correct copy of excerpts from the transcript of Greg Boswell's July 29, 2015 deposition.
10. Attached hereto as **Roberts Exhibit 9** is a true and correct copy of Secretary of State filing re: BMG Rights Managements (US) LLC.
11. Attached hereto as **Roberts Exhibit 10** is a true and correct copy of William Rosenblatt's July 24, 2015 Reply Report.
12. Attached hereto as **Roberts Exhibit 11** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00008542-8556.
13. Attached hereto as **Roberts Exhibit 12** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00103797
14. Attached hereto as **Roberts Exhibit 13** is a true and correct copy of excerpts from the transcript of Randall Cadenhead's June 9, 2015 deposition.
15. Attached hereto as **Roberts Exhibit 14** is a true and correct copy of excerpts from the transcript of Matthew Carothers' June 3, 2015 deposition.
16. Attached hereto as **Roberts Exhibit 15** is a true and correct copy of a document produced by Round Hill in this litigation as RH00004069.

17. Attached hereto as **Roberts Exhibit 16** is a true and correct copy of a document produced by Round Hill in this litigation as RH00004076.
18. Attached hereto as **Roberts Exhibit 17** is a true and correct copy of a document produced by Round Hill in this litigation as RH00004084.
19. Attached hereto as **Roberts Exhibit 18** is a true and correct copy of a document produced by Round Hill in this litigation as RH00003993.
20. Attached hereto as **Roberts Exhibit 19** is a true and correct copy of a document produced by Round Hill in this litigation as RH00004059.
21. Attached hereto as **Roberts Exhibit 20** is a true and correct copy of excerpts from the transcript of Robert Steele's June 11, 2015 deposition.
22. Attached hereto as **Roberts Exhibit 21** is a true and correct copy of excerpts from the transcript of Jason Zabek's June 2, 2015 deposition.
23. Attached hereto as **Roberts Exhibit 22** is a true and correct copy of excerpts from the transcript of Christopher Sabec's August 21, 2015 deposition.
24. Attached hereto as **Roberts Exhibit 23** is a true and correct copy of Cox's Response to Plaintiffs' Fourth Set of Interrogatories, served April 23, 2015.
25. Attached hereto as **Roberts Exhibit 24** is a true and correct copy of Cox's first Corrected Supplemental Response to Plaintiffs' Fourth Set of Interrogatories, served May 26, 2015.
26. Attached hereto as **Roberts Exhibit 25** is a true and correct copy of Cox's second Supplemental Response to Plaintiffs' Fourth Set of Interrogatories, served June 1, 2015.
27. Attached hereto as **Roberts Exhibit 26** is a true and correct copy of excerpts from the July 17, 2015 Hearing.

28. Attached hereto as **Roberts Exhibit 27** is a true and correct copy of Cox's Response to Plaintiffs' Sixth Set of Interrogatories, served August 13, 2015.
29. Attached hereto as **Roberts Exhibit 28** is a true and correct copy of Cox's Fourth Supplemental Response to Plaintiffs' Fourth Set of Interrogatories, served August 24, 2015.
30. Attached hereto as **Roberts Exhibit 29** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00207833.
31. Attached hereto as **Roberts Exhibit 30** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00207420-207423.
32. Attached hereto as **Roberts Exhibit 31** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00207705.
33. Attached hereto as **Roberts Exhibit 32** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00210346.
34. Attached hereto as **Roberts Exhibit 33** is a true and correct copy of a document produced by Cox in this litigation as COX\_BMG00207811.
35. Attached hereto as **Roberts Exhibit 34** is a true and correct copy of Cox's Response to Plaintiffs' Second Set of Interrogatories, served March 16, 2015.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 6, 2015 at Washington, D.C.

/s/ Stephanie L. Roberts  
Stephanie L. Roberts  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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